

# Supplier Code of Conduct

## AINS GROUP

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For public release



## 1. Introduction

### 1.1 Purpose

Suppliers that provide products or services to AINS Group must comply with applicable laws and regulations. The Supplier Code of Conduct complements them.

A violation of the Supplier Code of Conduct may, in serious cases, lead to termination of the contract or other legal actions.

### 1.2 Scope

Supplier Code of Conduct applies to all companies within the AINS Group, as well as all suppliers of services and goods that have a contractual relationship with these companies. For instance, subconsultants and administrative service providers.

As our subcontractor or supplier, you are responsible for ensuring that your own operations and those of your subcontractors follow this Supplier Code of Conduct. You must ensure that your personnel and subcontractors receive proper orientation and follow these principles.

## 2. Ethical conduct and speaking up

### 2.1 Monitoring

We reserve the right to conduct audits to ensure compliance with our Supplier Code of Conduct and other agreed requirements. During the audit process, we expect our suppliers to cooperate and not tolerate any attempts to mislead.

### 2.2 Reporting channels and handling suspected misconduct

Report any suspicion or concern related to misconduct to your contact person at AINS Group. If necessary, you may also submit a report anonymously using the secure [whistleblowing channel](#) available on our website.

Once a report is submitted, it is investigated and processed confidentially and without delay. In all cases, we protect the identity of the reporting person and protect them from retaliation. We also expect the protection of whistleblowers from our suppliers.

## 3. People

### 3.1 Human Rights

Human rights belong to everyone, and we do not tolerate any form of human rights violations. Together with our suppliers, we can promote the realisation of human rights and fair working conditions. It is our duty to address any human rights violations we witness.

We never allow:

- forced labour, human trafficking, child labour, or modern slavery in our business operations or value chain.

- restrictions on the right to unionise or engage in trade union activities against the local legislation.
- breaching local laws and regulations on wages and working hours.
- restrictions on workers' free movement, such as withholding passports or work permits as a condition for employment.
- neglecting employers' special obligations towards underage workers, such as assigning hazardous work to persons under 18 years of age.

### 3.2 Respectful treatment

We are committed to promoting equality, diversity, and inclusion in all our operations, and we expect the same from our suppliers. Every individual has the right to be treated with respect and in an equal and safe manner, regardless of their background, characteristics, or position.

We do not tolerate discrimination or unequal treatment on the basis of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, gender, any other personal characteristic, or other personal characteristic protected by the local law.

We do not tolerate any form of harassment, discrimination, bullying, or other inappropriate behaviour. Inappropriate conduct may appear in many forms, such as words, expressions, gestures, written communication, or physical actions.

Do this:

- Treat everyone with respect, regardless of background, identity, or characteristics, and provide equal opportunities.

We never allow:

- harassment, discrimination, bullying, or any other form of inappropriate conduct.

### 3.3 Occupational health and safety

We want every one of our experts, suppliers, and subcontractors to be able to work safely every day without endangering their health or wellbeing.

Our suppliers must safeguard everyone's right to refuse work or a task whose safety they are uncertain about.

Everyone is obligated to report accidents and near misses. We protect those who report incidents or who refuse dangerous work from any form of retaliation. Everyone has both the right and the obligation to participate in occupational safety-related orientations and training.

Working under the influence of alcohol, drugs, or any other intoxicating substances is prohibited.

Do this:

- Ensure that every employee is competent to perform the assigned task without compromising safety.

- Ensure that your personnel participate in the occupational safety training and orientations assigned by AINS Group or the management of a construction site.
- Stop working if safety is at risk and report any dangers you notice.

We never allow:

- endangering the safety or wellbeing of our personnel, the supplier's personnel, or subcontractors.

#### 4. Environment and quality

We comply with agreed quality, environmental, and safety requirements.

We identify the environmental risks associated with our operations. We utilise our expertise to reduce harm and increase environmentally positive impacts. We comply with environmental laws and regulations. The solutions we provide for our customers are safe for their users.

AINS Group is committed to systematically reducing the climate impact of its own operations, and we expect the same from our suppliers.

Do this:

- Report any observations and risks related to quality, the environment, and user safety.
- Identify and consider the environmental impacts of your work. Actively strive to reduce environmental harm.
- Comply with the quality, environmental, and safety requirements of AINS Group.

We never allow:

- violations of environmental legislation and regulations or indifference towards the natural environment.
- solutions that endanger users or neglect user safety.

#### 5. Fair Business Practices

##### 5.1 Anti-corruption

We do not accept corruption in any form. Corruption may take many forms, such as bribes, grease payments, kickbacks, or unfair favouring of relatives or acquaintances.

We expect our suppliers to operate in a manner that cannot be considered or interpreted as corrupt, even if it is not directly against the law or regulations.

Do this:

- Stay particularly alert in situations where the risk of corruption is unusually high.

We never allow:

- offering or accepting any advantages that could be considered corruption when dealing with AINS Group or other parties.

##### 5.2 Conflicts of interest

All employees of AINS Group must always act in the best interests of the company and avoid conflicts of interest.

Suppliers must avoid any conflicts of interest involving AINS Group or its employees. Identifying conflicts of interest is important, as even the impression of a conflict may damage the business operations and reputation of the company.

Do this:

- It is your duty to promptly report any conflicts of interest regarding AINS Group – whether that involves you or you have become aware of it.

We never allow:

- intentional concealment of conflicts of interest.

##### 5.3 Gifts, hospitality, and sponsorships

Hospitality refers to any advantage or gift that has value, for example, goods, favour, money, loan, entertainment, ticket, travel, or hospitality.

Any hospitality or gift given by or received by AINS Group must be customary and moderate. When we assess the moderateness of a gift, we take into account all gifts given or received by the same party throughout the year. The value of an individual gift or hospitality must be under 200 euros per person. We do not accept or give money or similar benefits, such as gift cards.

The same rules for giving and receiving gifts also apply to our suppliers when they represent AINS Group.

Our suppliers must not give or receive gifts or hospitality intended to gain an improper advantage or influence decision-making in an ongoing matter that concerns AINS Group – or when gifts or hospitality could appear as bribes. Suppliers are not allowed to make donations or offer sponsorships in the name of AINS Group or while representing AINS Group.

Do this:

- Avoid giving even moderate gifts or hospitality if they may influence—or be interpreted as influencing—ongoing decision-making, such as in tender processes.
- When representing AINS Group, always check our up-to-date guidelines when offering or receiving hospitality.

We never allow:

- giving or receiving gifts intended to influence decision-making concerning AINS Group.

##### 5.4 Fair Competition and Relations with Competitors

Our business operations are based on fair competition, which promotes efficiency and innovation, and in that way also a well-functioning market economy. As our supplier, you must not engage in arrangements to restrict competition, engage in bid-rigging, or participate

in price-fixing, market agreements or the manipulation and allocation of markets.

We acknowledge our market position as design, engineering, and construction management consultants, and do not accept its misuse by our suppliers.

We never allow:

- restricting fair competition.
- sharing of pricing, commercial terms, corporate acquisitions, or other confidential market information.

### **5.5 Sanctions and anti-money laundering**

We do not participate in money laundering or the financing of terrorism. We do not conduct business in countries or with companies and individuals that are subject to Western sanctions. We also require this from our suppliers.

The supplier must immediately inform AINS Group if the supplier, its owner, or its beneficial owner is - or becomes subject to Western sanctions or if they own a company located in a country that is subject to sanctions.

Do this:

- Be transparent about potential sanctions risks and report them to AINS Group without delay.

## **6. Information security, asset protection, and communication**

### **6.1 Information security and data protection**

Protecting our own and our clients' data is highly important. As our supplier, you are responsible for ensuring that information security and data protection meet the agreed requirements, as well as legal and regulatory obligations.

As our supplier, you must safeguard proper physical protection of devices and data as well as sufficient and up-to-date information security solutions. We expect our suppliers to foster a strong culture of information security in their organisation, including systematic management of information security risks across their entire supply chain. When using or developing artificial intelligence, exercise good judgment and promote transparency and accountability.

As our supplier, you must not collect or store personal data without a valid reason. You must protect personal data and destroy it if there are no legitimate reasons to retain it.

Do this:

- Report all information security observations, threats and breaches related to the operations of AINS Group to the IT department of AINS Group without delay.

We never allow:

- attempts to avoid or breach information security guidelines.

### **6.2 Asset protection, business-related documents, and communication**

As our supplier, you must respect AINS Group and its clients' assets, including business-related information and documents.

Your responsibility is to take care of these assets, only use them for agreed purposes according to your authorization, and respect the intellectual property rights of AINS Group and other parties.

Documentation must be sufficiently accurate, up-to-date, and truthful. We do not accept falsification, manipulation, or presentation of misleading information.

As our supplier, you commit to keeping all the materials you receive from AINS Group private from any third party as well as taking all reasonably expected measures to protect the materials from disclosure without AINS Group's written permission.

Using the AINS Group logo or our references requires written permission. Making public statements always requires separate approval.

Do this:

- Use the assets of AINS Group and its clients only for agreed work tasks. This applies to company workstations, vehicles, cameras, measuring equipment, and other assets.
- Invoices must be valid, accurate, and based on the agreed terms. We separate personal and leisure expenses from the expenses of AINS Group.
- We handle all documents, plans and designs, sample documents, and other documents related to AINS Group with due care and diligence.

We never allow:

- misuse of the assets or documents of AINS Group or its clients or directing them for private use, i.e. stealing
- falsifying costs, accounting records, documents, or key figures, or misleading the investigation of authorities or other parties.
- publishing confidential, personal, or commercial information related to AINS Group online or through any public channels.